

We at SB Communications are the licensee of Radio Station WCHM, in Clarkesville, GA. Our facility is a class C AM station serving a small community in Northeast Georgia. We fully support Docket No. 07-172 allowing AM stations to simulcast their programming on an FM translator for the following reasons. Over the past 10 to 20 years there has been a substantial increase in manmade interference. This interference has dramatically reduced both our daytime and nighttime coverage, making it difficult for many people in even our primary service contours during daytime hours to listen without objectionable interference. This has made it difficult for our community minded station to fully serve our city of license, let alone the immediate surrounding areas. The specter of IBOC nighttime interference will reduce that coverage even more. Many people who would like to listen to our community oriented station will not do so, as many will not listen to AM radio due to the audio limitations, and the inherent noise and interference that is far more prevalent today than just a couple of decades ago. The use of FM translators to overcome the increasing limitations to many AM stations would be of great service, particularly in smaller communities.

We also would like to see a preference given first to "stand alone" AM facilities operating with powers of 2500 watts or less. If an AM station has a related or co-located FM facility in the same city of license, or same market, the preference should be given to the licensee that only has a single AM station in their market.

Many small communities are served by just a single AM station. Many of these stations are daytime only, or with severe limitations on nighttime operation, as is the case with most post sunset authorities, and sky wave interference experienced by class C AM stations. In some cases there may be an FM licensed to that community by another entity, but their base of operations has long since moved to a bigger city, and the original city of license is virtually ignored.

We have no objections to using the FM translator for nighttime operations for a daytime only station, providing that if an AM station has a post sunset authority, that that operation be required to be used as a condition of operating the FM translator at night.

We would further request that in light of today's far more selective FM radios, that the 3rd adjacent consideration be dramatically minimized, and that directional antennas be permitted to avoid interference.